

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

ULTIMA SERVICES CORPORATION,                         )  
   )  
Plaintiff,   )  
   )  
v.   ) No. 2:20-cv-00041-DCLC-CRW  
   )  
U.S. DEPARTMENT OF AGRICULTURE,                     )  
et al.,   )  
   )  
Defendants.   )

**JOINT MOTION TO EXTEND PAGE LIMITATIONS  
FOR DISPOSITIVE MOTIONS AND RESPONSES**

Plaintiff Ultima Services Corporation and Defendants United States Department of Agriculture, the Secretary of Agriculture, the United States Small Business Administration, and the Administrator of the United States Small Business Administration (collectively, the “Parties”) jointly request additional pages in excess of the page limitations set forth in Local Rule 7.1(b) for the parties’ briefs in support of and in opposition to dispositive motions. In support of this Motion, the Parties state as follows:

1.       The Parties both intend to file motions for summary judgment by the June 21 deadline established in the Court’s May 5, 2022 Order.
2.       The Parties jointly request an additional 10 pages for the briefs supporting and opposing these motions.
3.       This is a complex and factually rich case involving an important question of constitutional law.
4.       Given the complexities of the issues presented in this matter and the large

volume of evidence relevant to the Court's review of the constitutionality of the race-conscious presumption in the Small Business Administration's Section 8(a) Business Development Program and its application in the circumstances relevant to this matter, good cause exists for this reasonable extension of the page limitations set forth in Local Rule 7.1(b).

THEREFORE, the parties request that the Court grant this Motion and Order that the parties may file briefs of up to 35 pages in support of and in opposition to dispositive motions.

Dated: June 3, 2022

Respectfully submitted,

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United States Department of Justice

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2022, I electronically filed the above document and attached proposed Order with the Clerk of the Court using the ECF System, which will send notification of such filing to all counsel of record.

/s/ Juliet E. Gray  
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